

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

GREATER ST. LOUIS CONSTRUCTION	)	
LABORERS WELFARE FUND, et al.,	)	
	)	
Plaintiffs,	)	No. 4:22-cv-00857-SRC
v.	)	
	)	
ST. CHARLES COUNTY PIPING, INC.,	)	
	)	
Defendant.	)	

**MOTION FOR EXTENSION OF TIME TO FILE DEFAULT MOTION**

Come now plaintiffs, through counsel, to request an extension of time through and including November 30, 2022 to file a motion for default judgment against defendant St. Charles County Piping, Inc. in this matter. In support of this Motion, plaintiffs state as follows:

1. The Clerk entered default against defendant on October 20, 2022 (ECF No. 8).
2. On November 2, 2022, this Court ordered plaintiffs to file an appropriate motion for default judgment against defendant by November 14, 2022 (ECF No. 9).
3. Defendant has been in contact with plaintiffs' counsel and has proposed a settlement to resolve the dispute. The proposal will be presented to plaintiff Trustees for formal approval at a meeting on November 16, 2022.
4. Plaintiffs' counsel expects that the proposal is likely to be approved by plaintiff Trustees. Once approved, plaintiffs will need additional time to finalize the details of the settlement but expect to accomplish that no later than November 30, 2022.
5. Given the likelihood of a mutually agreeable resolution to this matter, plaintiffs prefer not to pursue default judgment at this time.
6. If the requested extension is granted, plaintiffs expect to file a notice of dismissal on or before November 30, 2022.

WHEREFORE, plaintiffs respectfully request an extension of time through and including November 30, 2022 to file a motion for default judgment against plaintiffs.

Respectfully submitted,

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/s/ Emily R. Perez

EMILY R. PEREZ, #62537MO

Attorneys for Plaintiffs

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing was electronically filed with the Clerk of the Court on November 14, 2022. A copy was also sent to defendant's principals via email and U.S. Mail on November 14, 2022 to:

Pat and Sherrie Blattel  
St. Charles County Piping  
10 E. Pearce Blvd.  
Wentzville, MO 63366  
[patblattel@gmail.com](mailto:patblattel@gmail.com)

/s/ Emily R. Perez